

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

| | | |
|---|---|----------------------|
| ULYSSES RODRIGUEZ CHARLES, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | |
| |) | |
| CITY OF BOSTON; JOHN MULLIGAN, in |) | |
| his individual capacity; WILLIAM KEOUGH, |) | |
| in his individual capacity; PAUL RUFO, in his |) | |
| individual capacity; KATHLEEN HANLEY |) | |
| JOHNSON, in her individual capacity; |) | |
| STANLEY BOGDAN, in his individual |) | CASE NO. 04-10986-NG |
| capacity; JOHN DOE and JANE DOE, |) | |
| supervisors in the Boston Police Department, in |) | |
| their individual capacities; CHARLES CAMPO, |) | |
| in his individual capacity; JOHN ZANINI, in |) | |
| his individual capacity; SUFFOLK COUNTY |) | |
| and SUFFOLK COUNTY DISTRICT |) | |
| ATTORNEY'S OFFICE, |) | |
| |) | |
| Defendants. |) | |
| |) | |

**MOTION OF DEFENDANT CHARLES CAMPO FOR
EXTENSION OF TIME TO FILE RESPONSIVE PLEADING TO PLAINTIFF'S
COMPLAINT**

Defendant Charles Campo moves this honorable Court to extend the time within which he must file a responsive pleading to the Plaintiff's complaint for an additional thirty (30) days from the current due date of September 15, 2004 to October 15, 2004. Plaintiff has filed a twenty-seven page complaint against twelve Defendants alleging multiple federal and state law claims. The alleged claims against Mr. Campo are based on Mr. Campo's prosecution of the Plaintiff, over twenty years ago on multiple counts of aggravated rape, kidnapping and armed assault in a dwelling. Counsel for the Defendant is preparing a Motion to Dismiss all counts of the complaint against Mr.

Campo on the basis of absolute immunity from all of the Plaintiff's claims and furthermore that the Plaintiff's claims are barred by the applicable statute of limitations. Counsel needs additional time within which to complete the Motion to Dismiss and respectfully requests the Court to grant his request for an extension.

Respectfully Submitted,

CHARLES CAMPO,
By his attorney,

/s/ Richard M. Egbert
Richard M. Egbert (BBO # 151800)
99 Summer Street
Boston, MA 02110
617-737-8222

CERTIFICATE OF SERVICE

I, Richard M. Egbert, hereby certify that a true copy of the above document was served upon all parties of record by first class mail, postage prepaid, this 14th day of September 2004.

/s/ Richard M. Egbert
Richard M. Egbert